



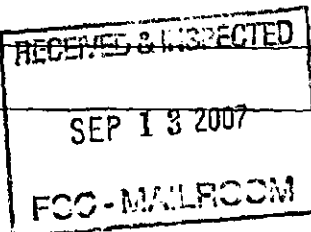
CLICK! NETWORK

3628 South 35th Street

Tacoma, Washington 98409-3192

TACOMA POWER

98-120



September 5, 2007

Chairman Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Proposed Triple Carriage Must-Carry Order

The Honorable Kevin J. Martin:

Tacoma Power's Click! Network strongly opposes the proposed triple carriage must-carry order. As a municipal cable operator and member of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA), Click! Network provides true competition in the cities where we offer services. Cable TV and Internet customers in Tacoma, Fircrest, University Place, Lakewood, Fife and Pierce County enjoy video and broadband choices that are rare in this country. Ten years ago Tacoma Power invested in fiber/coax infrastructure primarily for the power company's needs on which Click! Network also offers competitive telecommunication services.

Click! Network and other members of the ACA and NTCA are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per customer in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their customers.

If the triple-carriage requirement is enforced, Click! Network would be forced to remove existing channels from our channel lineup and reduce the amount of bandwidth available for broadband and voice services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their customers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm consumers and the companies that serve them. The Associations and their community-based members, along with the millions of customers they serve, and the 25,000 customers Click! Network serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service our customers enjoy and have come to expect from us.

Sincerely,

Cynthia Wikstrom
General Manager
Click! Network, Tacoma Power

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